

EXHIBIT G

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ROBERT WINGO,)	
Plaintiff,)	
vs.)	No. 08 c 368
THYSSENKRUPP MATERIALS NA,)	
INC., d/b/a COPPER AND BRASS)	
SALES,)	
Defendants.)	

The deposition of PATRICK BISHOP, called by the Plaintiff for examination, pursuant to subpoena, and pursuant to the provisions of the Code of Civil Procedure of the State of Illinois and the Rules of Supreme Court thereof pertaining to the taking of depositions for the purpose of discovery, taken before ROSE MARIE WEBER, a Certified Shorthand Reporter for the State of Illinois, at 29 South LaSalle Street, Suite 610, Chicago, Illinois, commencing on the 30th day of May, A.D. 2008, at the hour of 7:15 a.m.

1 A. 9471 Henry Street.

2 Q. How long have you lived at 9471 Henry
3 Street in Dyer, Indiana?

4 A. September 2006.

5 Q. And is your current residence a home
6 or an apartment?

7 A. It's a home.

8 Q. With whom do you reside at your home
9 in Dyer, Indiana?

10 A. My wife and three kids.

11 Q. Do you have any current intention on
12 relocating from your present home address within
13 the next year?

14 A. No, it's a brand new house.

15 MR. DISBROW: Moving is no fun
16 with three kids. I can attest to that.

17 THE WITNESS: I said from when we
18 moved from the old house, I'll never do that again.

19 BY MS. WEGNER:

20 Q. What is your date of birth, Mr.
21 Bishop?

22 A. 12-16-76.

23 Q. And what is your current age?

24 A. Thirty-one.

1 A. Munster, Indiana.

2 Q. And at what location do you currently
3 work with Copper and Brass Sales?

4 A. Schaumburg, Illinois.

5 Q. Did you transfer from the Copper and
6 Brass Sales, Munster, Indiana location to
7 Schaumburg?

8 A. Yes, I guess you can call it that.
9 They come down and asked us if we wanted jobs
10 there, that we'd still keep our seniority. We'd
11 keep basically everything we had. Just a transfer,
12 I guess, is the best way to put it.

13 Q. Was the Copper and Brass Sales
14 location at which you were employed in Munster,
15 Indiana closed at some time?

16 A. They closed in January of 2002.

17 Q. Are you a member of a union?

18 A. Yes.

19 Q. What union do you belong to?

20 A. Local 714.

21 Q. Has your union affiliation with the
22 teamsters?

23 A. Correct.

24 Q. What are your duties as a warehouseman

1 with Copper and Brass Sales?

2 A. Current?

3 Q. Yes.

4 A. I work in receiving, unloading trucks,
5 checking material in, tagging the material, putting
6 away the material.

7 Q. How long have you held your current
8 position with Copper and Brass Sales in receiving?

9 A. A year maybe, give or take a couple
10 months or so.

11 Q. Have you performed other warehouseman
12 positions while you've been employed at Copper and
13 Brass Sales?

14 A. Yes.

15 Q. What other job positions have you
16 worked in?

17 A. The rod, bar and wire area, driving a
18 side loader, pulling orders, PVC station, sheet
19 station, packing station. That's it.

20 Q. What duties did you perform in the
21 rod, bar and wire area at Copper and Brass?

22 A. Just packaging metal.

23 Q. And what process was used for you to
24 move within various stations at Copper and Brass

1 I got it.

2 Q. Well, when you were working in rod,
3 bar and wire on the second shift, do you know what
4 Mr. Wingo's position was?

5 A. I believe he was in the packing
6 station.

7 Q. Do you know -- When you worked in rod,
8 bar and wire on the second shift, were you required
9 to prepare production logs?

10 A. Yes. Yes, we were. Yes.

11 Q. What was the information you were
12 required to put on production logs?

13 A. You had your name at the bottom, you
14 put the date on the top, shift you were on, the
15 time you started and then each production sheet
16 goes 1 to 20 from the orders that you fill.

17 You put the work order number,
18 the pieces, the weight and the destination; the
19 time stopped. The time when you finished the
20 order. There is a start time and a stop time. Back
21 then there was only a stop time on the orders. Now,
22 we have a start and stop time.

23 Q. Did you receive training on filling
24 out the production logs at Copper and Brass Sales?

1 A. No, it's basically self-explanatory.

2 Q. When you completed production logs
3 working in RBW, what was the stop time that you
4 entered?

5 A. When you completed the order, when
6 you're officially done with the order.

7 Q. Did you work in rod, bar and wire on
8 the first shift at all?

9 A. Oh, a few times, only when somebody
10 was off and they would -- When I first started
11 first shift, I floated around. They put me to it.
12 You catch for the shear, sheet station, packing
13 station, PVC station, RBW, you know. They move you
14 around wherever you're needed. I was basically the
15 floater. I was the new guy on the shift.

16 Q. What were the duties that you
17 performed in the packing station?

18 A. Stuff that comes from the saws, the
19 shear bay and packing cush packs, 8 by 8 by 8
20 boxes, whatever. Basically like a UPS style but
21 UPS doesn't go until the afternoon.

22 Q. When was it that the production logs
23 were changed to reflect both a start and stop
24 sometime?

1 business, no.

2 BY MS. WEGNER:

3 Q. Have you been made aware of what Mr.
4 Wingo's claiming in his lawsuit?

5 A. No, I haven't.

6 Q. In his lawsuit, Mr. Wingo is claiming
7 that he was treated less favorably than other
8 employees at Copper and Brass Sales because of his
9 age.

10 Did you ever witness any instance
11 where you thought Mr. Wingo being treated less
12 favorably than other employees because of his age?

13 A. No.

14 Q. Did Mr. Wingo ever complain to you
15 while you worked with him at Copper and Brass
16 Sales' Schaumburg location that he felt he was
17 being treated unfairly?

18 MR. DISBROW: Objection to the
19 form of the question as ambiguous in its current
20 form.

21 THE WITNESS: No, no.

22 BY MS. WEGNER:

23 Q. Mr. Wingo never said to you he thought
24 that something had happened to him at work was not

1 THE WITNESS: I believe you just
2 told me that he was for age discrimination. I
3 think you said.

4 BY MS. WEGNER:

5 Q. So, no one ever told you that Mr.
6 Wingo was terminated for any specific type of rule
7 violation; is that right?

8 A. No. That's none of my business.

9 Q. Are you familiar with the work rules
10 at Copper and Brass Sales?

11 A. Most of them, yes.

12 Q. Have you ever received any training on
13 the Copper and Brass Sales work and safety rules?

14 A. Yes.

15 Q. Are you aware of a major work rule
16 enforced at Copper and Brass Sales relating to
17 falsifying company records?

18 A. It's in our union contract. I believe
19 it's a Class D violation, which is an automatic
20 violation.

21 Q. And have you ever been made aware of
22 the company's definition of "falsifying company
23 records"?

24 A. No, I never have.